

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Develop a Risk-Based Decision-Making Framework to Evaluate Safety and Reliability Improvements and Revise the General Rate Case Plan for Energy Utilities.	Rulemaking 13-11-006 (November 14, 2013)
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**DECISION AWARDING INTERVENOR COMPENSATION
TO COMMUNITIES FOR A BETTER ENVIRONMENT FOR
CONTRIBUTION TO DECISION 14-12-025**

Intervenor: Communities for a Better Environment (CBE)	For contribution to Decision (D.) 14-12-025
Claimed: \$32,010	Awarded: \$25,618.80 (~19.97% reduction)
Assigned Commissioner: Michel Peter Florio	Assigned ALJ: John Wong

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	Addresses the changes to incorporate a risk-based decision-making framework into the Rate Case Plan for the energy utilities' General Rate Cases to assist energy utilities in assessing, managing, mitigating, and minimizing their safety risks.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:

	Intervenor	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference (PHC):	April 29, 2014	Verified.
2. Other specified date for NOI:	May 29, 2014	Verified.
3. Date NOI filed:	May 13, 2014	Verified.
4. Was the NOI timely filed?	Yes, CBE timely filed the notice of intent to claim intervenor compensation.	

Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	R.13-11-006	Verified.
6. Date of ALJ ruling:	July 25, 2014	Verified.
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer or customer-related status?		Yes, CBE demonstrated appropriate status as a customer.
Showing of “significant financial hardship” (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	R.13-11-006	Verified.
10. Date of ALJ ruling:	July 25, 2014	Verified.
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes, CBE demonstrated significant financial hardship.
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.14-12-025	Verified.
14. Date of issuance of Final Order or Decision:	12/9/2014	Verified.
15. File date of compensation request:	2/6/2015	Verified.
16. Was the request for compensation timely?		Yes, CBE timely filed the request for compensation.

C. Additional Comments on Part I (use line reference # as appropriate):

#	CBE’s Comment(s)	CPUC Discussion
1	Communities for a Better Environment (“CBE”) is an environmental justice organization with members throughout the state of California. CBE is a non-profit public interest organization. CBE’s mission is to achieve environmental health and justice in California’s low-income communities of color by preventing and reducing pollution, and building green, healthy and sustainable communities and environments. CBE’s members also live, work, breath and play in close proximity to industrial facilities, and are therefore also on the front lines of potential catastrophic industrial disasters. The concerns of these members distinguish their interests from Commission staff and other California ratepayers participating in this matter. CBE is pushing for policies at the federal, state, regional, and local levels that protect the health and safety of workers and community. CBE’s concerns for	Verified.

	industrial safety extend to all industrial infrastructure that endanger the health and safety of workers and communities in and around low-income communities of color. CBE supports the use of inherently safer systems in risk-based decision making. Moreover, CBE is also actively pursuing adoption of the Safety Case Regulatory Regime at industrial facilities, including power plants (and related infrastructure, such as pipelines). CBE offers organizing, legal, and research resources to the communities most at risk from harmful incidents that occur at these facilities in the absence of such policies.	
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PART II: SUBSTANTIAL CONTRIBUTION**A. Did the Intervenor substantially contribute to the final decision (*see* § 1802(i), § 1803(a), and D.98-04-059).**

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>The Commission adopted many of CBE's recommendations regarding prioritizing safety, the broad scope of safety including not just the top 10 assets, providing for public and worker input, expanding the information provided in the verification documents, and acknowledging the need to provide guidelines and standards to the utilities.</p> <p>To the extent the Commission deferred CBE's specific other recommendations to the S-MAP proceedings, note that in A.06-11-007, the Commission recognized that it may benefit from an intervenor's participation even where the Commission did not adopt any of the intervenor's positions or recommendations. The Commission held that an intervenor's opposition can provide important information regarding all issues that needed to be considered in deciding whether to approve a particular application. Such opposition allows the Commission to properly and thoroughly analyze all aspects leading to a decision/consider the consequences of adopting or rejecting applications.</p> <p>Here, though a rulemaking rather an application, even though the Commission declined to consider which methodologies to use, CBE's insistence on the iterative and inherent nature of safety within a utility's operations and</p>		Verified.

<p>processes is seen reflected in the Commission’s understanding of the S-MAP process, and should help guide the Commission during these proceedings.</p> <p>CBE therefore requests that the Commission find a substantial contribution warranting an award of intervenor compensation for the reasonable costs and expenses incurred by CBE as follows:</p>		
<p><u>1. Goal: Prioritize “safety” of public and employees above other considerations</u></p> <p>CBE provided extensive comments that state law requires utilities to prioritize safety in their processes and assets. CBE argued throughout the proceeding that is must prioritize safety over other considerations. CBE also argued that that this safety priority extends to electrical as well as gas utilities.</p>	<p>CBE Straw Proposal Redlines (4/7/14), pp. 2, 6, 7, 10.</p> <p>CBE Opening Comments on RSP (5/23/14), pp. 1-2, 12-14.</p> <p>CBE Reply Comments on RSP (6/13/14), pp. 6-7, 11-13.</p> <p>D.14-12-025, p. 25: The objective is to fulfill this state’s policy of ensuring that the Commission and each energy utility place the safety of the public and its employees as the top priority.</p> <p>D.14-12-025: Findings of Fact: 1, 2, 3.</p> <p>D.14-12-025: Conclusions of Law: 4</p>	<p>Verified.</p>
<p><u>2. Scope of risk-assessment: “Safety risk” must be considered “broadly” to include related considerations, risks to more than assets (especially top 10 assets), and to include workers as well as public</u></p> <p>CBE provided extensive comments and briefing on the extent of what should be included in the goal of improving safety, urging that safety include more than focusing on top 10 assets, but to include related safety issues as well. CBE also argued that that this extends to processes as well as assets, and must include</p>	<p>CBE Straw Proposal Redlines (4/7/14), pp. 7-9.</p> <p>CBE Opening Comments on RSP (5/23/14), pp. 6-7.</p> <p>CBE Reply Comments on RSP (6/13/14), pp. 2-3, 6-7.</p> <p>CBE Comments on Proposed Decision (11/21/14), pp. 1, 3-5.</p> <p>CBE Reply Comments on Proposed Decision (12/1/14), pp. 1-2.</p> <p>D.14-12-025, pp. 39-40: <i>We agree with those parties who commented</i></p>	<p>Verified, but we note CBE put forth arguments that were duplicative of MGRA and TURN on this issue. This demonstrates that the parties failed to adequately coordinate on this issue, which resulted in a</p>

protecting workers as well as the public.	<p><i>that the utility's RAMP submission should not be limited to just a risk assessment and mitigation of the utility's top 10 assets for family of assets. Limiting the RAMP submission may prevent the Commission and interested parties from having a comprehensive view of the utilities potential safety risks, and its plans for addressing those risks....The RAMP should not be limited to a maximum of 10 asset categories. Accordingly, the utility's RAMP submission shall include all of its risk assessments and mitigation plans. (emph added.)</i></p> <p>D.14-12-025, p. 20: Though reliability is not explicitly included in the risk-assessment, reliability-related issues can affect safety, and in those situations, reliability should be included in the assessment of safety.</p> <p>D.14-12-025, p. 25: Utilities must put safety of public and employees as top priority.</p> <p>D.14-12-025, p. 26: Goal of upcoming and future S-MAP proceedings is for the Commission to determine whether uniform and common standards can be developed for assessing, managing, mitigating, and minimizing risks that are inherent in each utility's <i>operations and services</i> (emph added).</p>	duplicative effort. ¹
<p><u>3. Goal: Participatory Inclusivity</u></p> <p>CBE argued throughout the proceeding that the final risk-based decisionmaking proceeding must provide for meaningful public and worker participation opportunities at all phases of the proceeding. The Decision has</p>	<p>CBE Straw Proposal Redlines (4/7/14), pp. 3 (comment 1), 4.</p> <p>CBE Opening Comments on RSP (5/23/14), pp. 3-4.</p> <p>CBE Reply Comments on RSP (6/13/14), p. 13.</p>	Verified, but we note CBE put forth arguments that were duplicative of UCAN on this issue. This

¹ See Pub. Util. Code § 1801.3(f) (stating that intervenor compensation program articles “shall be administered in a manner that avoids unproductive or unnecessary participation that duplicates the participation of similar interests otherwise adequately represented or participation that is not necessary for a fair determination of the proceeding.”); See also D.15-05-016.

<p>incorporated workshops and opportunities for public comment and discussion.</p>	<p>D.14-12-025, p. 21-22: Purpose of S-MAP is to allow Commission and parties to examine, understand, and comment on the models the utilities plan to use, and to allow Commission to establish guidelines and standards for these models. (See also, Findings of Fact: 18-21.)</p> <p>D.14-12-025, p. 27: Workshops as part of the S-MAP could be useful toward reaching a consensus about uniform or common standards.</p> <p>D.14-12-025, pp. 38-39: Utilities will file the RAMP. Then Commission staff, as well as other parties, will have a chance to understand and respond to the analysis, data, and underlying assumptions. After the RAMP filing, there will be a public workshop and an SED report. Other parties will be given an opportunity to comment on the RAMP submission and report, which could then be followed by additional workshops to discuss all RAMP-related items.</p>	<p>demonstrates that the parties failed to adequately coordinate on this issue, which resulted in a duplicative effort.</p>
<p><u>4. S-MAP and RAMP: Commission must provide guidelines and standards for utilities that help them assess and mitigate risks</u></p> <p>CBE argued throughout the proceeding that the Commission must adopt clear performance-based standards against which it can measure the assessments and mitigation plans presented by the utilities. The Commission recognized the need for this, and will use the S-MAP proceedings to develop these standards. To the extent CBE may be unable to find the resources to participate in all of the subsequent S-MAP proceedings, CBE has provided extensive examples and documentation of existing standards the Commission can and should use in evaluating utility proposals in the S-MAPs.</p>	<p>CBE Straw Proposal Redlines (4/7/14), pp. 3-5.</p> <p>CBE Opening Comments on RSP (5/23/14), pp. 7-12.</p> <p>CBE Reply Comments on RSP (6/13/14), pp. 3-5.</p> <p>CBE Comments on Proposed Decision (11/21/14), pp. 1-5.</p> <p>D.14-12-025, p. 21: Recognize the S-MAP and RAMP need to be clarified so that the utilities know ahead of time what they must do, and that S-MAP and RAMP will continue to evolve over time as the utilities gain familiarity with these processes.</p> <p>D.14-12-025, p. 21-22: Purpose of S-MAP is to allow Commission and parties to examine, understand, and</p>	<p>Verified.</p>

	<p>comment on the models the utilities plan to use, and to allow Commission to establish guidelines and standards for these models. (See also, Findings of Fact: 18-21.)</p> <p>D.14-12-025, p. 26: Goal of upcoming and future S-MAP proceedings is for the Commission to determine whether uniform and common standards can be developed for assessing, managing, mitigating, and minimizing risks that are inherent in each utility's operations and services, and if so, should they be applied to some or all of the energy utilities.</p>	
<p><u>5. S-MAP and RAMP: Risk-Assessment must be Ongoing</u></p> <p>CBE argued that in order for safety to truly be prioritized, it must be an ongoing, iterative process during which the utilities continually refine and assess their safety models and practices.</p>	<p>CBE Straw Proposal Redlines (4/7/14), p. 11.</p> <p>CBE Reply Comments on RSP (6/13/14), pp. 2, 10.</p> <p>CBE Comments on Proposed Decision (11/21/14), pp. 5-6.</p> <p>D.14-12-025, p. 23: The RSP recommends that the S-MAP continue on a periodic basis, such as every three years.</p> <p>D.14-12-025, p. 27: S-MAP should be held <i>at least</i> two times.... A recurring proceeding is needed initially to analyze and understand each utility's approach to assessing, managing, and mitigating their risks, to refine such models, and to develop and refine uniform and common standards (emph added).</p>	<p>Verified, but we note CBE put forth arguments that were duplicative of MGRA, UCAN, and TURN on this issue. This demonstrates that the parties failed to adequately coordinate on this issue, which resulted in a duplicative effort.</p>
<p><u>6. S-MAP and RAMP: Commission should consider regulatory regimes that already exist, and that are suggested by the public and interested parties at subsequent workshops, such as Inherently Safer Systems (ISS)</u></p> <p>Although the Commission declined to adopt a specific regulatory regime at this time, it recognized the need explore whether and how one could be adopted--during the S-MAP proceedings.</p>	<p>CBE Straw Proposal Redlines (4/7/14), pp. 3-5, 7.</p> <p>CBE Opening Comments on RSP (5/23/14), pp. 7-12, 15-16.</p> <p>CBE Reply Comments on RSP (6/13/14), pp. 1-2, 7-11.</p> <p>CBE Comments on Proposed Decision (11/21/14), pp. 1-5.</p> <p>CBE Comments on Proposed Decision (11/21/14), pp. 8-9.</p>	<p>Verified.</p>

<p>The Commission also recognized that parties may not have the resources to participate in these proceedings (D.14-12-025, p. 28). To the extent that may be true in CBE's case (though CBE will need to analyze this at the time), CBE has provided extensive comments and documentation on the benefits of incorporating ISS and similar regimes into risk-based decision-making. The Commission can now (and should) use this evidence and documentation during the subsequent S-MAP proceedings to incorporate these regimes into the RAMP and GRC for the utilities.</p>	<p>D.14-12-025, p. 21-22: Purpose of S-MAP is to allow Commission and parties to examine, understand, and comment on the models the utilities plan to use, and to allow Commission to establish guidelines and standards for these models. (See also, Findings of Fact: 18-21.)</p> <p>D.14-12-025, p. 27: Workshops as part of the S-MAP could be useful toward reaching a consensus about uniform or common standards.</p> <p>D.14-12-025, p. 28: Parties interested in participating in the S-MAP will need to decide if they have the resources and expertise to participate in the S-MAP and whether they can afford to retain a consultant.</p> <p>D.14-12-025, p. 29: Risk assessment approaches like probabilistic risk assessment, Inherently Safer Systems, etc. will be explored and evaluated in the S-MAP proceeding when the utilities propose their approaches. The S-MAP will explore and evaluate: whether to use them, how they should be structured, advantages and disadvantages of each approach, and the inputs that the utilities are relying on for their risk assessments.</p>	
<p><u>7. S-MAP and RAMP: Risk Assessment must include alternatives analysis and mitigation options that prioritize safety</u></p>	<p>CBE Straw Proposal Redlines (4/7/14), pp. 3-4, 8.</p> <p>CBE Reply Comments on RSP (6/13/14), p. 5 (utility must present both alternatives analysis plus justification for choice)</p> <p>D.14-12-025, p. 33: SED will issue a report on each utility's RAMP that would assess the risk assessment procedures, and address: Are there any significant risks that have been missed in the proposal? Are there reasonable mitigation options that have not been examined?</p>	<p>Verified, but we note CBE put forth arguments that were duplicative of TURN on this issue. This demonstrates that the parties failed to adequately coordinate on this issue, which resulted in a duplicative effort.</p>

<p><u>8. Verification: Must include meaningful measures of effectiveness and these reports must be included in the GRC record</u></p> <p>CBE argued that the verification process must involve more than simply comparing projected costs and benefits to actual costs and benefits, and comparing what the utility said it would do to what it did. Rather, the process needs to include measures to determine whether the utilities are, in fact, conducting effective risk-based decision-making.</p>	<p>CBE Straw Proposal Redlines (4/7/14), p. 12.</p> <p>CBE Opening Comments on RSP (5/23/14), pp. 14-15.</p> <p>CBE Comments on Proposed Decision (11/21/14), pp. 6-8.</p> <p>CBE Reply Comments on Proposed Decision, p. 3.</p> <p>D.14-12-025, p. 46: In addition to the requirements of the verification forms in the RSP, the two reports shall explain how these risk mitigation activities and risk spending are meeting the goals for managing and minimizing activities and risk spending are meeting the goals for managing and minimizing the risks that were identified in the utility's RAMP and GRC submissions. The two reports shall also describe any deviation, reasons for doing so, and what activities were actually performed.</p> <p>D.14-12-025, p. 47: Parties may request in S-MAP or RAMP proceedings to hold workshops on the type of information that needs to be reported in these two reports, and the methodology that can be used to quantify and measure the benefits of such mitigation plans and safety activities.</p>	<p>Verified, but we note CBE put forth arguments that were duplicative of UCAN on this issue. This demonstrates that the parties failed to adequately coordinate on this issue, which resulted in a duplicative effort.</p>
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor's Assertion	CPUC Discussion
a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?²	Yes	Verified.
b. Were there other parties to the proceeding with positions similar to yours?	Yes (on some positions)	Verified.
c. If so, provide name of other parties: CUE, MGRA, EPUC, UCAN		Verified.

² The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill No. 96 (Budget Act of 2013: public resources), which was approved by the Governor on September 26, 2013.

<p>d. Intervenor’s claim of non-duplication:</p> <p>This was an unusual proceeding, in that the advocates took very different approaches to the policy and procedural issues under discussion here. CBE found itself aligned with other parties in some respects, but not in others. This is a key policy issue that has the potential to create fundamental change in the way utilities operate and assess/mitigate their risks. Parties had widely disparate views of how this should happen, but the decision, taking into account all of this input, makes a step in the right direction. Therefore, CBE agrees with TURN that the Commission should find that it is more difficult than usual to achieve non-duplication in proceedings such as this rulemaking and, therefore, apply a more relaxed standard for intervenor compensation purposes.</p> <p>That said, CBE attempted to avoid duplication at all stages of the proceeding. CBE drafted arguments focused on these areas and geared towards answering the questions raised in the Scoping Memo, and to address the specific proposals of the utilities. Coordination with other parties allowed CBE to make singular arguments of specific concern to its members. CBE made every effort to avoid duplication of issues, and to note in its briefing when it specifically agreed with other parties. When similar issues were covered, CBE provided analysis and studies that highlighted its own arguments and added to other common arguments.</p>	<p>Verified, but further coordination would have reduced duplication. <i>See</i> Part II.A, above (noting issues where duplicative views were presented).</p> <p>The Commission has removed 15% of the intervenor’s claimed hours for each issue where duplication occurred.</p>
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PART III: REASONABLENESS OF REQUESTED COMPENSATION

A. General Claim of Reasonableness (§ 1801 and § 1806):

<p>a. Intervenor’s claim of cost reasonableness:</p> <p>This rulemaking was intended to encourage all interested parties and, ultimately, the Commission to consider fundamental issues regarding how utilities incorporate risk-based decisionmaking not only into general rate cases, but in their operations. As CBE showed in its comments, it is an extremely important and cutting-edge matter that is being debated within industry sectors worldwide. Although the Commission did not consider “the specific model” of risk assessment and mitigation, it did recognize the value in those, and in creating uniform regulations and performance standards, as well as prioritizing safety and expanding the scope of the verification to inquire into the choices made by the utilities and how they are/are not working to improve safety.</p> <p>Further, the Commission and the utilities can use CBE’s comments regarding how utilities can incorporate inherent safety into their S-MAP proposals in upcoming S-MAP and RAMP proceedings. At the same time, CBE will not need to expend (or claim) as much time and resources on commenting and participating in these proceedings as it otherwise might have.</p>	<p style="text-align: center;">CPUC Discussion</p> <hr/> <p>Verified.</p>
<p>b. Reasonableness of hours claimed:</p> <p>CBE’s hours were extremely reasonably spent, divided into categories as shown in the timesheets (Attachment 2).</p>	<p>Verified. <i>But see</i> CPUC Disallowances and Adjustments, below.</p>

<p>CBE has excluded all time for all communications, internally between attorneys and an expert, and also between allies that would have to either duplication of time or duplication of issues.</p> <p>The rates requested for these tasks are at the low end of the ranges authorized by the CPUC for attorneys. In addition, CBE is not requesting compensation for the time of its experts, nor will CBE seek compensation for the second phase of the proceeding, even though CBE participated, and is not claiming costs.</p> <p>These considerations are reflected in the attached timesheets (Attachment 2).</p>	
<p>c. Allocation of hours by issue:</p> <p>CBE divided issues so as not to duplicate work. The issues and division of work are reflected in the attached timesheets (Attachment 2).</p>	Verified.

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Maya Golden-Krasner	2014	67.5	300	NOI	20,250	61.57	\$240.00 [1],[2]	14,776.80
Roger Lin	2014	25.7	300	NOI	7,710	25.14	\$300 <i>See</i> D.14-06-047, Res. ALJ 287, Res. ALJ-303 [3]	7,542.00
<i>Subtotal: \$27,960</i>						<i>Subtotal: \$22,318.80</i>		
OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Maya Golden-Krasner	2014	8	150	½ requested 2014 rate	\$1,200	8	\$120.00	960.00
<i>Subtotal: \$1,200</i>						<i>Subtotal: \$960.00</i>		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Maya Golden-Krasner	2015	17	150	½ requested 2014 rate	\$2,550	17	\$120.00	2,040.00

Roger Lin	2015	2	150	½ requested 2014 rate	\$300	2	\$150.00	300.00
Subtotal: \$ 2,850						Subtotal: \$2,340.00		
TOTAL REQUEST: \$ 32,010						TOTAL AWARD: \$25,618.80		
<p>**We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor’s records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time typically compensated at ½ of preparer’s normal hourly rate</p>								
ATTORNEY INFORMATION								
Attorney		Date Admitted to CA BAR ³		Member Number		Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation		
Maya Golden-Krasner		December 2001		217557		No		
Roger Lin		January 2007		248144		No		

c. CPUC Disallowances and Adjustments:

Item	Reason
[1]	<p>Because this is Golden-Krasner's first appearance before the Commission, the Commission must establish an hourly rate. Based on the resume provided by CBE, and the legal experience documented therein, the Commission sets Golden-Krasner's rate at \$240.</p> <p>The Commission did not adopt a cost-of-living adjustment for 2015. <i>See</i> Resolution ALJ-303. As such, Golden-Krasner's 2015 rate is set at \$240.</p>
[2]	<p>The Commission does not compensate attorneys for work that is clerical in nature, as such work has been factored into the established rate. The following hours are disallowed from Golden-Krasner's 2014 claim as clerical:</p> <p>3/16/2014 – 1.7 hours; 5/13/14 – 0.4 hour; 5/23/14 – 0.5 hour; 11/21/14 – 0.5 hour; 11/24/14 - 0.3 hour; 12/01/14 – 0.4 hour.</p> <p>For the duplication discussed above, the Commission removed 15% of Golden-Krasner's</p>

³ This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

	2014 hours for Issues B, C, E, G, H, which resulted in a disallowance of 2.13 hours.
[3]	For the duplication discussed above, the Commission removed 15% of Lin's 2014 hours for Issues B, C, E, G, H, which resulted in a disallowance of 0.558 hours.

PART IV: OPPOSITIONS AND COMMENTS

**Within 30 days after service of this Claim, Commission Staff
or any other party may file a response to the Claim (see § 1804(c))**

A. Opposition: Did any party oppose the Claim?	No.
B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6))?	Yes.

FINDINGS OF FACT

1. Communities for a Better Environment has made a substantial contribution to D.14-12-025.
2. The requested hourly rates for Communities for a Better Environment's representatives, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$25,618.80.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. Communities for a Better Environment shall be awarded \$25,618.80.
2. Within 30 days of the effective date of this decision PacifiCorp, Pacific Gas and Electric Company, San Diego Gas & Electric Company, Liberty Utilities LLC, Southern California Edison Company, Southern California Gas Company, and Southwest Gas Company shall pay Communities for a Better Environment their respective shares of the award, based on their California-jurisdictional gas and electric revenues for the 2014 calendar year, to reflect the year in which the proceeding was primarily litigated. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning April 22, 2015, the 75th day after the filing of Community for a Better Environment's request, and continuing until full payment is made.

3. The comment period for today's decision is waived.
4. This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX A

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	No
Contribution Decision(s):	D1412025		
Proceeding(s):	R1311006		
Author:	ALJ Wong		
Payer(s):	PacifiCorp, Pacific Gas and Electric Company, San Diego Gas & Electric Company, Liberty Utilities (CalPeco Electric) LLC, Southern California Edison Company, Southern California Gas Company, and Southwest Gas Company		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Communities for a Better Environment (CBE)	02/06/2015	\$32,010.00	\$25,618.80	No.	See Disallowances and Adjustments, above.

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Maya	Golden-Krasner	Attorney	CBE	\$300.00	2014	\$240.00
Maya	Golden-Krasner	Attorney	CBE	\$300.00	2015	\$240.00
Roger	Lin	Attorney	CBE	\$300.00	2014	\$300.00
Roger	Lin	Attorney	CBE	\$300.00	2015	\$300.00